

Exhibit A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

PATRICIA KAMMEYER, et al.	:	Case No. C-1-01-649
	:	J. Spiegel
Plaintiffs,	:	
	:	
v.	:	
	:	
CITY OF SHARONVILLE, OHIO, et al.	:	<u>AFFIDAVIT OF LESLIE E. GHIZ</u>
	:	
Defendants.	:	

State of Ohio)
) SS
County of Hamilton)

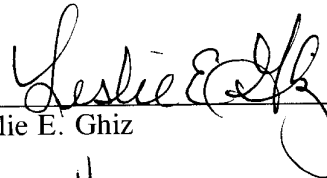
Leslie E. Ghiz, being first duly cautioned and sworn, states as follows:

1. I am co-counsel for Defendant James Cramer in this matter. Since the onset of this litigation, Defendant has repeatedly attempted to obtain Plaintiffs' discovery responses.
2. After Plaintiffs failed to timely report to Defendant's interrogatories and document requests, and failed to respond to Defendant's subsequent request for compliance, I contacted Plaintiffs' counsel via telephone and again requested compliance, on or about March 22, 2004.
3. Plaintiffs' counsel promised production of responses and documents by March 26, 2004.
4. After failing to produce responses and documents by March 26, 2004, Plaintiffs' counsel promised production of responses by March 29, 2004.
5. Plaintiffs failed to produce responses to Defendant's discovery requests by March 29, 2004; again I requested compliance of Plaintiffs' counsel via telephone.

6. On March 29, 2004, Plaintiffs' counsel promised production by March 31, 2004, during our March 29, 2004 telephone conversation.

7. To date, Plaintiffs have failed to produce responses to Defendant's interrogatories and document requests.


Further Affiant Sayeth Naught.



Leslie E. Ghiz

Sworn to and subscribed before me on this 6th day of April, 2004.





Notary Public
Margaret E. Clark, Attorney at Law
Notary Public, State of Ohio
Commission expires 04/03/07



MARGARETH CLARK, Attorney at Law
Notary Public, State of Ohio
Commission expires 04/03/07